

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

SOFTEX LLC,

Plaintiff,

v.

ABSOLUTE SOFTWARE CORP. and
ABSOLUTE SOFTWARE, INC.

Defendants.

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Civil Action No. 1:22-cv-01308-DAE

JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND DEADLINES

Plaintiff, Softex LLC (“Softex”) and Defendants, Absolute Software Corporation and Absolute Software Inc. (“Absolute”), file this Joint Motion to Extend the deadline to complete fact discovery by 24 days, to and including June 21, 2024, in order to allow sufficient time to accommodate witnesses’ availability for depositions.¹ The parties agree that no new written discovery requests may be propounded to Plaintiff or Defendants (including HP and Dell).

The parties further agree to extend the mediation deadline from June 4, 2024, to September 20, 2024.

¹ The depositions of the following witnesses will be taken on or before June 21, 2024: (1) Ms. Wright (HP); Mr. Tonry (Dell); Mr. Hadri (Absolute); Mr. Parish (Absolute); Mr. Deck (Absolute); Mr. Dunn (Absolute); Mr. Livingston (Absolute); Mr. Phillipson (3rd party former Softex Inc.); Mr. Capetillo (HP); Ms. Buck (Dell); Dell 30(b)(6) (Topics 2-14); HP 30(b)(6) (Topics 1, 13, 14); Crosspoint (3rd party). To accommodate counsel and witness availability, Mr. Ciccarelli’s deposition will be taken out of time on July 2, 2024. The parties currently dispute whether Lenovo (3rd party) must sit for a deposition. Assuming that Lenovo’s motion to quash is denied or withdrawn, the parties will work cooperatively to schedule that deposition as soon as practicable. No other depositions will be taken after June 21, 2024.

Dated: May 24, 2024

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Dated: May 24, 2024

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on May 24, 2024, with the Clerk of the Court for the Western District of Texas by using the CM/ECF system, causing electronic service upon all counsel of record.

/s/ Blair M. Jacobs

Blair M. Jacobs